

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

KATHRYN BAUMAN RUBENSTEIN,)	
)	
Plaintiff,)	
)	
v.)	CIVIL CASE NO. 1:07cv798-MHT
)	
JAMES D. HAMLETT, Esq., et al.,)	
)	
Defendants.)	

INTERROGATORIES TO THE PLAINTIFF

COMES NOW Defendant James D. Hamlett and hereby requests that the Plaintiff answer each of the following Interrogatories per the *Alabama Rules of Civil Procedure*.

1. State your name, date of birth, and social security number.
2. Please describe in complete detail each and every communication, in whatever form, between yourself and James Hamlett concerning subject matter made the basis of this suit, including for each such communication:
 - (a) The time and place at which it was made;
 - (b) The name and address of each person who participated in, witnessed, or has knowledge of such communication, and the relationship, if any, of each such person to the plaintiff;
 - (c) The nature of each such communication (e.g. oral, written, gesture, tape recording, etc.,) specifying which portions were made in each manner; and
 - (d) The exact wording of each verbal communication, whether oral or written,

giving all statements in chronological order with the person making each statement clearly identified.

3. Please describe in detail the exact scope of Defendant James Hamlett's representation of you as described in the Complaint, along the exact wording of any conversations or writings memorializing the scope of said representation.

4. Describe in detail each and every act or omission amended by any Defendant in this action that constitutes malpractice or falls below the acceptable standard of care.

5. Please describe in detail each harm which was suffered by you or any other person as a result of the alleged occurrences made the basis of this lawsuit, indicating who was harmed and stating when, how and why such harm occurred, and include the itemization of all expenses or other damages claimed by you as a proximate cause of the harm.

6. Please give the name and address and qualifications of each witness you plan to call as an expert in this action, stating the anticipated testimony of each such expert, and the basis of each opinion to be given by said expert.

7. If you have ever been a party or witness in any other civil proceeding identify the jurisdiction, civil action number, nature and disposition of each such proceeding.

8. State the name of each and every person that you contend has knowledge with respect to the claims made in your Complaint. With respect to each such person:

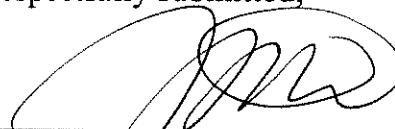
- (a) Identify them by name, address and telephone number;
- (b) Describe what information you claim each such person possesses; and
- (c) Describe how each said individual came to be in possession of said

knowledge.

9. Describe each and every category of damage that you are claiming in this case.

With respect to each said category, state the exact amount of expense incurred to date, and describe the method that you utilized in determining the extent of said damages.

Respectfully submitted,



JOSEPH E. STOTT (ASB-4163-T71J)
Attorney for Defendant James D. Hamlett

OF COUNSEL:

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CERTIFICATE OF SERVICE

This is to certify that on October 19, 2007, I filed the foregoing and sent notification of such filing to counsel who are listed as CM/ECF participants via email only: Wade H. Baxley, Esq., Don P. Bennett, Esq. Jack M. Conaway, Esq., James D. Farmer, Esq., Robert M. Girardeau, Esq., William W. Hinesley, Esq., William L. Lee, III, Esq., Steve G. McGowan, Esq., Virginia L. McInnis, Esq., R. Cliff Mendheim, Esq., William W. Nichols, Esq., Jere C. Segrest, Esq., Phillip D. Segrest, Jr., Esq., Gary C. Sherrer, Esq., John A. Smyth, III, Esq., Anne S. Sumblin, Esq., Joel W. Weatherford, Esq., F. Chadwick Morriss, Esq., Bethany L. Bloger, Esq., T. Grant Sexton, Esq., and I hereby certify that I have mailed by United States Postal Service the document to all non-CM/ECF participants:

Ms. Judy Byrd
407 Drake Drive
Dothan, AL 36305

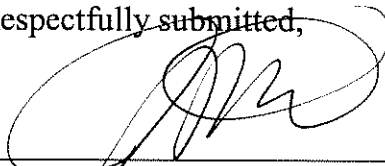
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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Stott', is written over a horizontal line.

JOSEPH E. STOTT (ASB-4163-T71J)

Attorney for Defendant James D. Hamlett

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